

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

: Case Nos.: 21 MC 102 (AKH)

: 21 MC 103 (AKH)

THIS DOCUMENT APPLIES TO ALL LOWER
MANHATTAN DISASTER SITE LITIGATION

: **MOTION FOR ADMISSION**
: ***PRO HAC VICE* PURSUANT TO**
: **LOCAL CIVIL RULE 1.3(c)**

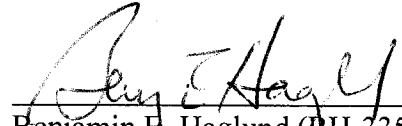
PLEASE TAKE NOTICE that upon the annexed affidavit of Benjamin E. Haglund in support of this motion and the Certificates of Good Standing annexed thereto, the undersigned, Benjamin E. Haglund, a member in good standing of the bar of this Court, and pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, hereby moves this Court for an Order allowing the admission *pro hac vice* of:

Andrés Acebo
Day Pitney LLP
One Jefferson Road
Parsippany, New Jersey 07054-2891
T (973) 966-8051
F (973) 995-4543

Andrés Acebo is a member in good standing of the Bars of the State of New Jersey and Washington, D.C., and is admitted to practice for the United States District Court for the District of New Jersey. There are no pending disciplinary proceedings against Andrés Acebo in any State or Federal court.

Dated: April 1, 2013

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Benjamin H. Haglund", is written over a horizontal line.

Benjamin H. Haglund (BH-3350)

Day Pitney LLP

One Jefferson Road

Parsippany, New Jersey 07054-2891

T (973) 966-8155

F (973) 206-6546

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

Case Nos.: 21 MC 102 (AKH)

21 MC 103 (AKH)

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**AFFIDAVIT OF BENJAMIN E.
HAGLUND IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE PURSUANT TO
LOCAL CIVIL RULE 1.3(c)**

State of New Jersey)
) ss:
County of Morris)

Benjamin E. Haglund, being duly sworn, hereby deposes and says as follows:

1. I am a member of the firm Day Pitney LLP, counsel for Defendants Deutsche Bank

Trust Corporation, Deutsche Bank Trust Company Americas, DB Private Clients Corporation and DBAB Wall Street LLC (collectively “Deutsche Bank Defendants”) in the above captioned action. I am familiar with the proceedings in these cases. I make this statement based on my personal knowledge of the facts set forth herein and in support of the Deutsche Bank Defendants’ motion to admit Andrés Acebo as counsel *pro hac vice* to represent the Deutsche Bank Defendants in these matters.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on January 16, 1996. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. Mr. Acebo has been practicing law since 2011 and I have known him since September 2012.

4. Mr. Acebo is an Associate at Day Pitney LLP in Parsippany, New Jersey.

5. I have found Mr. Acebo to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. As evidenced by the Certificates of Good Standing annexed hereto as Exhibit A, Mr. Acebo is a member in good standing of the Bars of the State of New Jersey and Washington, D.C. Accordingly, I am pleased to move for the admission of Mr. Acebo, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Mr. Acebo, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Mr. Acebo, *pro hac vice*, to represent Deutsche Bank Defendants in the above captioned matters, be granted.

Dated: Parsippany, New Jersey

April 1, 2013

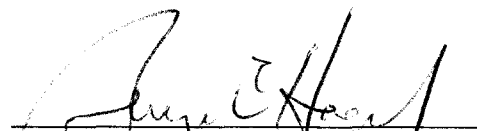
Sworn to before me on this
15 day of April, 2013



Notary Public

MARY ANN OLIVIERI
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES JULY 11, 2015

Respectfully submitted,



Benjamin E. Haglund (BH3350)

EXHIBIT A

Supreme Court of New Jersey



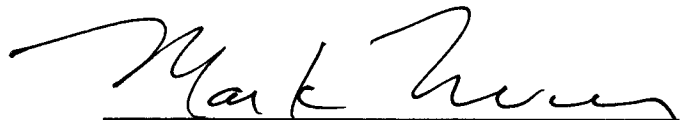
Certificate of Good Standing

This is to certify that **ANDRES ACEBO**
(No. **018032011**) was constituted and appointed an Attorney at Law of New
Jersey on **November 28, 2011** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if
the Court's records reflect that the attorney: 1) is current with all assessments imposed as a
part of the filing of the annual Attorney Registration Statement, including, but not limited
to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not
suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this
State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-
12.

Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice
law in this State.

In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
25TH day of **March**, 20 **13**.


Clerk of the Supreme Court



District of Columbia Court of Appeals
Committee on Admissions
430 E Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

ANDRES ACEBO

was on JANUARY 11, 2013, duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on March 26, 2013 .

JULIO A. CASTILLO
Clerk of the Court

By: *Blanca A. Sanchez*
Deputy Clerk

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE WORLD TRADE CENTER LOWER
MANHATTAN DISASTER SITE LITIGATION

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Case Nos.: 21 MC 102 (AKH)

21 MC 103 (AKH)

ORDER

Hon. Alvin K. Hellerstein

THIS MATTER comes before me upon the motion of Benjamin E. Haglund, Day Pitney LLP, counsel for Defendants Deutsche Bank Trust Corporation, Deutsche Bank Trust Company Americas, DB Private Clients Corporation and DBAB Wall Street LLC (collectively “Deutsche Bank Defendants”), and said sponsor attorney’s affidavit in support;

IT IS HEREBY ORDERED that

**Andrés Acebo
Day Pitney LLP
One Jefferson Road
Parsippany, New Jersey 07054-2891
T (973) 966-8051
F (973) 995-4543**

is admitted to practice *pro hac vice* as counsel for Defendants Deutsche Bank Trust Corporation, Deutsche Bank Trust Company Americas, DB Private Clients Corporation and DBAB Wall Street LLC (collectively “Deutsche Bank Defendants”) in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court

are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: New York, New York

_____, 2013

Alvin K. Hellerstein, U.S.D.J.

CERTIFICATE OF SERVICE

I, Benjamin E. Haglund, hereby certify that I caused true copies of the foregoing to be served via regular mail on the 2nd day of April 2013, upon the following Plaintiff's Liaison Counsel:

Paul Napoli, Esq.
Worby Groner Edelman & Napoli Bern LLP
350 5th Avenue
Suite 7413
New York, NY 10118

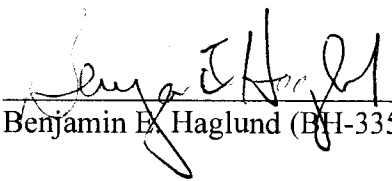
Robert A. Grochow, Esq.
Robert A. Grochow, P.C.
233 Broadway, 5th Floor
New York, New York 10279

Gregory J. Cannata, Esq.
Law Offices of Gregory J. Cannata
233 Broadway, 5th Floor
New York, New York 10279

and upon the following Defendants' Liaison Counsel:

Richard E. Leff, Esq.
McGivney & Kluger, P.C.
80 Broad Street, 23rd Floor
New York, New York 10004

Lee Ann Stevenson
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022


Benjamin E. Haglund (BH-3350)